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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

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12 UNITED STATES OF AMERICA,
13 Plaintiff,

14 v.
15

16 CARLOS VICTOR MESTANZA
17 CERCADO, et al.,

18 Defendants.
19
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Case No. CR 25-CR-00198-KK-1

DEFENDANT CARLOS
CERCADO'S *UNOPPOSED* EX-
PARTE APPLICATION FOR
ORDER RE PREPARATION OF A
PRE-PLEA REPORT; [Proposed]
ORDER

21
22 Defendant Carlos Cercado, through his attorney Adam Axelrad, applies to the
23 Court for an Order directing the United States Probation Office to prepare a pre-plea
24 report, without interviewing the defendant, and limited to determining defendant's
25 criminal history category and career offender status.

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1 Grounds for this application are set forth below in the declaration of counsel.
2 The government does not oppose the requested Order.

3 DATED: September 4, 2025

Respectfully submitted,

/S/ Adam Axelrad

DECLARATION OF ADAM AXELRAD

I, Adam Axelrad, declare:

1. I am the CJA panel attorney appointed to represent defendant Carlos Cercado in this case.

2. The preparation of a pre plea report addressing Mr. Cercado's criminal history and career offender status is important because it will substantially assist me in ascertaining and understanding my client's criminal history and issues connected thereto, advising him about relevant sentencing ranges and sentencing exposure, and otherwise providing information important to deciding how to proceed in this case.

3. Accordingly, I am requesting that the Court direct the United States Probation Office to prepare a pre-plea report for Mr. Cercado without interviewing him which addresses his criminal history and his career offender status. On or about August 18, 2025, I corresponded by email with AUSA Jena MacCabe, one of the attorneys representing the government in this matter, and she indicated that the government has no objection to defendant's request.

4. Additionally, so as reduce duplicate work and the costs of same, I also request that the Court direct the USPO to provide me with copies of the criminal history or other records or documents that it considers or uses to prepare the report on defendant Cercado. That way, my investigator and I would not need to expend the time and incur the costs required to locate and obtain the same records.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 4, 2025 at Santa Monica, California.

S/ Adam Axelrad